

July 26, 2018

*Via ECFS*

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: WC Docket No. 18-210; IB File No. ITC-T/C-20180703-00142

Dear Ms. Dortch,

At the request of Commission staff, GPC, Inc. (“GPC”) and Great Plains Communications Holdings LLC (“GPC Holdings”) (and jointly, “Applicants”), submit this letter to provide certain clarifying information with regard to their Joint Domestic and International Application (“Joint Application”), filed on July 3, 2018.

First, as noted in the Joint Application, (a) Texas Emerging Managers Private Markets Program, L.P. (“Texas Emerging Managers”) is an insulated limited partner of Grain Communications Opportunity Fund II, LP. and will indirectly own 14.67 percent of the equity in GPC Holdings; (b) GCM CFGP GP, LLC (“GCM CFGP”) manages and is the sole general partner of Texas Emerging Managers. By this letter, the Applicants supplement this description to note that GCM CFGP is a U.S. entity organized under Delaware law.

Second, as noted in the Joint Application, Grain Management, LLC (“Grain Management”) manages and is affiliated with Grain Communications Opportunity Fund II, L.P., which will directly own GPC Holdings. By this letter, the Joint Applicants supplement their application to note that Grain Management owns a controlling interest in WANRack, LLC (“WANRack”).

WANRack is a competitive provider that builds private fiber networks for K-12 school districts, providing services that include E-Rate compliant lit fiber, dark fiber, and special construction services. In connection with these offerings, WANRack holds certificates of public convenience and necessity (“CPCNs”) in the states in which it operates, including in Colorado and Kansas. As disclosed in the Joint Applications, GPC also operates in portions of Colorado and Kansas. WANRack does not, however, provide service in areas that overlap or are adjacent to the GPC service area, including in Colorado and Kansas.

Please contact the undersigned should you have questions concerning this submission.

Respectfully submitted,

**GREAT PLAINS COMMUNICATIONS  
HOLDINGS LLC**

**GPC, INC.**

/s/ Matthew S. DelNero

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